

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

IN RE:

Cathy Lorraine Williams

Case No. 19-10655

Chapter 13

Debtor

**RESPONSE TO DEBTOR'S OBJECTION TO CLAIM #2 FILED BY U.S. BANK  
TRUST, N.A.**

COMES NOW, U.S. Bank Trust, N.A., as Trustee of Cabana Series III Trust, as successor and assigns (BSI Financial Services, INC., servicer) ("Respondent"), by and through undersigned counsel and hereby responds to the Objection to Claim #2 Filed by U.S. Bank Trust, N.A. ("Objection to Claim") filed herein and in support thereof states as follows:

1. Respondent admits the allegations contained within Paragraph 1.
2. Respondent admits the allegation contained within Paragraph 2 that it filed a Proof of Claim which was docketed as claim number 2, but denies that the mortgage arrears stated therein is \$63,779.80. The arrears identified in the Respondent's Proof of Claim are in the amount of \$22,844.75.
3. Respondent denies the allegations contained within Paragraph 3.

WHEREFORE, Respondent, by and through undersigned counsel respectfully requests that this honorable court deny the Objection to Claim and for such other and further relief as this court deems just and proper.

Respectfully submitted:

/s/ Joshua Welborn, Esq. (Jwel)

Joshua Welborn, Esq.

Attorney for Secured Creditor

Bar No. 29359  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of May, 2019 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Robert S. Thomas, II  
300 E Joppa Road, Suite 409  
Towson, Maryland 21286  
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Marlow Allen Henderson, III  
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Pikesville, Maryland 21208  
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I hereby further certify that on the 8th day of May, 2019, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Cathy Lorraine Williams  
8801 Harkate Way  
Randallstown, Maryland 21133  
(Via U.S Mail)

/s/ Joshua Welborn, Esq.  
Joshua Welborn, Esq.